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Southern District of New York
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May 29, 2020

By ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

**Re: *United States v. Maria Fernanda Gutierrez Ospino and
Jose Andre Urena Sancho, 20 Cr. 102 (VEC)***

Dear Judge Caproni:

With the consent of the Government, and joined by Julia Kefalinos, counsel for Maria Fernanda Gutierrez Ospino, I write on behalf of my client Jose Andre Urena Sancho to request a 45-day adjournment of the status conference presently scheduled for June 17, 2020 in the above-captioned case.

Due to the COVID-19 pandemic, counsel for both defendants have encountered difficulty in their efforts to review discovery with their clients. Discovery in the case is voluminous. Additionally, as noted in an earlier adjournment request filed by Ms. Kefalinos, Ms. Gutierrez Ospino has a newborn baby. ECF No. 36. According to Ms. Kefalinos, her client is still struggling with the numerous challenges involved in parenting a newborn and does not feel comfortable traveling to New York at this time.

The parties consent to the exclusion of time under the Speedy Trial Act through the next conference date scheduled by the Court. Thank you for your consideration of this request.

Application GRANTED. The June 17, 2020, conference is adjourned to **August 6, 2020, at 2:00 P.M.** If necessary, the Court will consider a request for Ms. Ospino to appear remotely. The Court finds that the health risks due to COVID-19 and the additional time needed for Defendants to review discovery outweigh the interests in speedy trial; time shall be excluded from June 17, 2020, to August 6, 2020.

SO ORDERED.

Date: 05/29/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
Assistant Federal Defender
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